

November 14, 2003

Michael O. Leavitt, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
ATTN: Chemical Right-To-Know Program

**Re: Revised Diesters Category Test Plan and Changes to Panel Chemical Commitments and Company Membership for Aliphatic Esters Panel, HPV Consortium**

Dear Administrator Leavitt:

The American Chemistry Council's Aliphatic Esters Panel (Panel) is pleased to submit for review the first of five revised Test Plans. These plans incorporate suggestions made during the public comment process for the Panel's original Category Test Plan, which was submitted on December 20, 2001. Also, the Panel wishes to inform EPA of changes to its chemical commitments and company membership in the High Production Volume (HPV) Challenge program.

The Panel considered comments on the original Category Test Plan and concluded that the five chemical groups do not share read-across data between groups. As a result, the Panel has developed five separate Category Test Plans.

With this letter, the Panel submits the Test Plan and Robust Summaries for the Diesters Category. The Panel plans to submit a total of five separate Category Test Plans on the following categories:

- Monoesters (Group A)
- Diesters (Group B) – submitted for review on November 14, 2003.
- Glycol Esters (Group C)
- Sorbitan Esters (Group D)
- Polyol Esters (Group E)

A list of the chemicals in each category is attached to this letter.



The Panel also wishes to inform EPA of changes to its chemical commitments and company membership, and asks that EPA update its HPV Summary Report accordingly:

- A list of current Aliphatic Esters chemical categories is provided in Attachment 1.
- The Panel is adding the following chemicals to its HPV sponsorship:
  - Glycol Esters Category (Group C)
    - Hexanoic acid, 2-ethyl-, diester with triethylene glycol (CAS # 94-28-0)  
(Co-sponsored with The C.P. Hall Co.)
  - Polyol Esters Category (Group E)
    - Pentaerythritol tetrastearate (CAS # 115-83-3)  
(Co-sponsored with Cognis Corp.)
    - Fatty acids, tall-oil, tetraesters with pentaerythritol (CAS # 68334-18-9)
    - Linseed oil, ester with pentaerythritol (CAS # 68648-28-2)
- Because the Soap and Detergent Association (SDA)-managed APAG/SDA Fatty Acid Esters Consortium is sponsoring the following chemicals as part of the International Council of Chemical Association's (ICCA) HPV Initiative, the Panel is no longer sponsoring them in the HPV program:
  - Oleic acid, methyl ester (CAS # 112-62-9)
  - Oleic acid, butyl ester (CAS # 142-77-8)
  - Palmitic acid, isopropyl ester (CAS # 142-91-6)
  - Fatty acids, tallow, Me esters (CAS # 61788-61-2)
- Because the SDA-managed CESIO/SDA Glycerides Consortium is sponsoring the following chemicals as part of the ICCA HPV Initiative, the Panel is no longer sponsoring them in the HPV program:
  - Olein, tri- (CAS # 122-32-7)
  - Glycerides, C14-18 mono- and di- (CAS # 67701-33-1)
- The Panel wishes to correct the name of one chemical as it is listed on EPA's HPV Summary Report:
  - Fatty acids, C5-10, mixed esters with pentaerythritol and valeric acid (CAS # 68424-34-0) (correction noted in underline)

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- A list of current Panel member companies is provided in Attachment 2.
- The following company has left the Panel and is no longer sponsoring Aliphatic Esters chemicals as part of the Panel's sponsorship under the HPV program:
  - The BFGoodrich Co.

Please return comments or questions regarding the revised Category Test Plans to John Morris, the Aliphatic Esters Panel Manager, at (703) 741-5631 or [john\\_morris@americanchemistry.com](mailto:john_morris@americanchemistry.com).

Sincerely yours,

Courtney M. Price  
Vice President, CHEMSTAR

#### Attachments

cc with attachments:

Wardner Penberthy, EPA  
Oscar Hernandez, EPA  
Aliphatic Esters Panel  
Alvaro DeCarvalho, SDA  
Steve Russell, ACC  
Jim Keith, ACC

### ATTACHMENT 1 - Aliphatic Esters Categories and Chemicals

CAS No.	NAME
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#### Group A - Monoacids and Monoalcohols "Monoesters"

29806-73-3	Palmitic acid, 2-ethylhexyl ester
31556-45-3	Stearic acid, tridecyl ester
68334-13-4	Fatty acids, tall-oil, 2-ethylhexyl esters

#### Group B - Diacids and Monoalcohols "Diesters"

103-24-2	Azelaic acid, bis(2-ethylhexyl) ester
105-52-2	Maleic acid, bis(1,3-dimethylbutyl) ester
106-79-6	Sebacic acid, dimethyl ester
108-63-4	Adipic acid, bis(1-methylheptyl) ester
122-62-3	Sebacic acid, bis(2-ethylhexyl) ester
141-17-3	Adipic acid, bis[2-(2-butoxyethoxy)ethyl] ester
142-16-5	Maleic acid, bis(2-ethylhexyl) ester
1330-86-5	Adipic acid, diisooctyl ester
6938-94-9	Adipic acid, diisopropyl ester
16958-92-2	Adipic acid, ditridecyl ester
27178-16-1	Adipic acid, diisodecyl ester
28472-97-1	Azelaic acid, diisodecyl ester
33703-08-1	Adipic acid, diisononyl ester

#### Group C - Monoacids and Dihydroxy alcohols "Glycol esters"

94-28-0	Hexanoic acid, 2-ethyl-, diester with triethylene glycol
105-62-4	Oleic acid, propylene ester
111-60-4	Stearic acid, 2-hydroxyethyl ester
627-83-8	Stearic acid, ethylene ester
18268-70-7	Hexanoic acid, 2-ethyl-, diester with tetraethylene glycol
42222-50-4	9-Octadecenoic acid (Z)-, 2,2-dimethyl-1,3-propanediyl ester
67989-24-6	9-Octadecenoic acid (Z)-, ester with 2,2-dimethyl-1,3-propanediol
68583-52-8	Decanoic acid, mixed diesters with octanoic acid and triethylene glycol
70729-68-9	Heptanoic acid, oxybis(2,1-ethanediyloxy-2,1-ethanediyl) ester

**Group D - Monoacids and Sorbitan "Sorbitan esters"**

1338-39-2	Sorbitan, monolaurate
1338-41-6	Sorbitan, monostearate
1338-43-8	Sorbitan, monooleate
8007-43-0	Sorbitan, sesquioleate
26266-58-0	Sorbitan, trioleate
68154-36-9	Fatty acids, coco, monoesters with sorbitan

**Group E - Monoacids and trihydroxy or polyhydroxy alcohols (polyols) "Polyol esters"**

115-83-3	Pentaerythritol tetrastearate
126-57-8	Nonanoic acid, triester with 2-ethyl-2-(hydroxymethyl)-1,3-propanediol
11138-60-6	Decanoic acid, ester with 2-ethyl-2-(hydroxymethyl)-1,3-propanediol octanoate
14450-05-6	Nonanoic acid, neopentanetetrayl ester
57675-44-2	9-Octadecenoic acid (Z)-, 2-ethyl-2-[[1-(1-oxo-9-octadecenyl)oxy]methyl]-1,3-propanediyl ester, (Z)-
67762-52-1	Carboxylic acids, C5-9, hexaesters with dipentaerythritol
67762-53-2	Carboxylic acids, C5-9, tetraesters with pentaerythritol
68002-79-9	Fatty acids, C14-18 and C16-18 unsatd, triesters with trimethylolpropane
68130-51-8	Decanoic acid, mixed esters with heptanoic acid, isovaleric acid, octanoic acid and pentaerythritol
68130-53-0	Decanoic acid, mixed esters with heptanoic acid, octanoic acid and trimethylolpropane
68334-18-9	Fatty acids, tall-oil, tetraesters with pentaerythritol
68424-31-7	Fatty acids, C5-10, esters with pentaerythritol
68424-34-0	Fatty acids, C5-10, mixed esters with pentaerythritol and valeric acid
68648-28-2	Linseed oil, ester with pentaerythritol
70024-57-6	9-Octadecenoic acid (Z)-, ester with 2-ethyl-2-(hydroxymethyl)-1,3-propanediol
70983-72-1	Fatty acids, C5-10, esters with dipentaerythritol

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**ATTACHMENT 2 - Current Membership of Aliphatic Esters Panel**

Arizona Chemical Company  
BASF Corporation  
Cognis Corporation  
The C.P. Hall Company  
Crompton Corporation  
Cytec Industries Incorporated  
E.I. du Pont de Nemours and Company  
ExxonMobil Chemical Company  
Goldschmidt Chemical Corporation  
Hercules Incorporated  
Inolex Chemical Company  
Kaufman Holdings Corporation  
Quaker Chemical Corporation  
Rohm and Haas Company  
Stepan Company  
Sunoco Incorporated (R & M)  
Uniqema  
Velsicol Chemical Corporation